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19 FIDELITY NATIONAL TITLE INSURANCE COMPANY

20 DESIGNATED LOCAL COUNSEL FOR SERVICE OF  
21 PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

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25 **UNITED STATES DISTRICT COURT**

26 **DISTRICT OF NEVADA**

27 WELL FARGO BANK, N.A.,

28 Plaintiff,

vs.

FIDELITY NATIONAL TITLE GROUP,  
INC. et al.,

Defendants.

Case No.: 2:21-cv-01009-RFB-VCF

**STIPULATION AND ORDER TO  
EXTEND TIME TO REPLY IN  
SUPPORT OF MOTION TO DISMISS  
AND OPPOSE COUNTERMOTION  
FOR PARTIAL SUMMARY  
JUDGMENT (ECF NOS. 29, 30)**

**FIRST REQUEST**

25 COMES NOW defendant Fidelity National Title Insurance Company (“Fidelity”) and  
plaintiff Wells Fargo Bank National Association (“Wells Fargo”), by and through their respective  
attorneys of record, which hereby agree and stipulate as follows:

26 1. On May 25, 2021, Wells Fargo filed its complaint in the Eighth Judicial District  
27 Court for the State of Nevada;

1       2.     On May 26, 2021, Fidelity removed the instant case to the United States District  
2 Court for the State of Nevada (ECF No. 1);

3       3.     On September 2, 2021, Fidelity moved to dismiss Wells Fargo's complaint (ECF  
4 No. 20);

5       4.     On October 15, 2021, Wells Fargo opposed Fidelity's motion to dismiss (ECF No.  
6 29) and filed a countermotion for partial summary judgment (ECF No. 30);

7       5.     Counsel for Fidelity requests a 31-day extension of time for Fidelity to file its  
8 opposition to Wells Fargo's countermotion for partial summary judgment and a 45-day extension  
9 of Fidelity's deadline to reply in support of its motion to dismiss, such that both shall be due on  
10 Monday, December 6, 2021, to afford Fidelity's counsel additional time to review and respond to  
11 the arguments in Wells Fargo's opposition and countermotion.

12       6.     Counsel for Wells Fargo does not oppose the requested extension;

13       7.     This is the first request for an extension made by counsel for Fidelity, which is  
14 made in good faith and not for the purposes of delay.

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1 **IT IS SO STIPULATED** that Fidelity's deadline to reply in support of its motion to  
2 dismiss and oppose the countermotion for partial summary judgment are hereby extended through  
3 and including Monday, December 6, 2021.

4 Dated: October 19, 2021

SINCLAIR BRAUN LLP

6 By: /s/-Kevin S. Sinclair

7 KEVIN S. SINCLAIR

8 Attorneys for Defendant

FIDELITY NATIONAL TITLE INSURANCE  
COMPANY

9 Dated: October 19, 2021

WRIGHT FINLAY & ZAK, LLP

11 By: /s/-Lindsay D. Dragon

12 LINDSAY D. DRAGON

13 Attorneys for Plaintiff

14 WELLS FARGO BANK NATIONAL  
ASSOCIATION.

15 **IT IS SO ORDERED.**

16 Dated this 19th day of October, 2021.



17 RICHARD F. BOULWARE, II  
18 UNITED STATES DISTRICT JUDGE